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U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 17, 2019

BY ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: *United States v. Kromah, et al.*, 19 Cr. 338 (GHW)

Dear Judge Woods:

At the initial conference in this case held June 19, 2019, Your Honor set a discovery schedule pursuant to which the Government would produce discovery on a rolling basis through July 19, 2019. The Government produced certain discovery to defense counsel on or about July 1, 2019, and intends to make another production this week. Due to delays in obtaining and processing the material to be produced, however, the Government respectfully requests an extension until August 2, 2019, to complete its rolling production. The Government has conferred with counsel for the defendant, Connor McNamara, Esq., who does not object to this request.

Additionally, pursuant to Federal Rule of Criminal Procedure 16, “[a]t any time the court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief.” Fed. R. Crim. P. 16(d). The Government submits that good cause justifies the issuance of a protective order in this case given the nature and volume of information to be disclosed. Accordingly, the Government respectfully requests that the Court enter the attached proposed protective order, to which counsel for all appearing parties have consented. *See* Exhibit A.

Very truly yours,

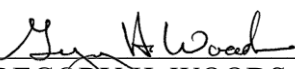
GEOFFREY S. BERMAN
United States Attorney
Southern District of New York

Application granted. The Government may complete its rolling production of discovery by August 2, 2019. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 16.

SO ORDERED.

By: Jarrod L. Schaeffer
Sagar K. Ravi
Jarrod Schaeffer
Assistant United States Attorney
Tel: (212) 637-2195 / 2270

Dated: July 18, 2019
New York, New York


GREGORY H. WOODS
United States District Judge